## BURSOR FISHE

DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 11/12/2024

1330 AVENUE OF THE AMERICAS 32 ND FLOOR
NEW YORK, NY 10019
WWW.bursor.com

Tel: 646.837.7408
Fax: 212.989.9163
ykopel@bursor.com

November 8, 2024

## Via ECF

The Honorable Analisa Torres United States District Court Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007

**Re:** Consent Request to Stay Case Pending Arbitration

Harwell v. McGraw Hill LLC, Case No. 1:24-cv-07222-AT

## Dear Judge Torres:

I represent Plaintiff Maxwell Harwell in the above matter. Pursuant to Rule 1.C of the Court's Individual Rules, I write jointly on behalf of Plaintiff and Defendant McGraw Hill LLC ("McGraw Hill" and collectively the "Parties") to request a stay of this matter pending the Parties' agreement to arbitrate with the American Arbitration Association.

Good cause exists to grant this stay. On October 8, 2024, Defendant filed a letter motion seeking an extension to file its Answer. ECF No. 9. The same day, the Court issued an Order granting Defendant's letter motion for an extension. ECF No. 10. Defendant requested an extension to further investigate and analyze the Complaint (ECF No. 1). The Parties have since met and conferred and have agreed to proceed in arbitration in front of the American Arbitration Association.

Accordingly, the Parties request that the Court lift the following deadlines and stay the case to allow the Parties to proceed in arbitration:

Event	Current Deadline
Joint letter	Nov. 22, 2024
Defendant's Answer	Nov. 22, 2024
Magistrate Judge consent	Nov. 22, 2024
Jointly proposed Case Management Plan and Scheduling Order	Nov. 22, 2024

The Parties further request that they be directed to provide the Court with a status update the later of ten days after conclusion of any arbitration or nine months from the date of entry of any stay.

Defendant previously requested an extension of time to file its response to the Complaint, which the Court granted (ECF Nos. 9-10).

GRANTED IN PART. This action is STAYED pending arbitration. By **March 12, 2025**, the parties shall file a joint status letter updating the Court on the status of the arbitration proceeding.

SO ORDERED.

Dated: November 12, 2024 New York, New York

ANALISA TORRES United States District Judge